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**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 3/6/2020

March 5, 2020

Via ECF

The Honorable Vernon S. Broderick
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Plaintiff's opposition or amended complaint shall be filed no later than March 23, 2020. If Plaintiff files an opposition, Defendant's reply shall be filed no later than April 13, 2020. The parties shall meet and confer and file a status update no later than March 13, 2020 apprising the court of whether they will participate in a second mediation conference.

Re: **Knight v. MTA-New York City Transit Authority, No. 19-cv-9960 (VSB-GWG)**

Dear Judge Broderick:

This firm represents Plaintiff, Christine N. Knight, in the above-referenced matter and we write to you pursuant to your Honor's individual rule 1(G) to request a 2-week extension of time to oppose Defendant's Motion to Dismiss Plaintiff's Complaint and Collective and Class Action Complaint (Docket # 15, 16).

Plaintiff's opposition to the motion is due to be submitted on Friday, March 6, 2020. Plaintiff requests until March 23, 2020 to file her opposition, as well as a commensurate extension of time for Defendant to reply to April 13, 2020. This is Plaintiff's first request for an extension of time. Defendant made a previous request for an extension of time for a mediator to be appointed (Docket # 13), which was granted in part (Docket # 14). Defendant does not object to Plaintiff's request. The parties' participated in a Court Ordered mediation (Docket # 12, 14) on March 3, 2020, and Plaintiff makes this request based on her belief that continued settlement discussions may be a productive step toward extra-judicial resolution of Plaintiff's case. In addition, the extension of time will allow Plaintiff's counsel to evaluate information recently provided by Plaintiff, and determine if, with the Court's permission, Plaintiff can cure purported defects by filing of an amended complaint.

Thank you for your consideration of this request.



The Honorable Vernon S. Broderick
March 5, 2020
Page 2

Respectfully submitted,
ADVOCATES FOR JUSTICE,
CHARTERED ATTORNEYS
Attorneys for Plaintiff

/s/

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cc: counsel of record, *via ecf*